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February 27, 2008

OpticTel  
P. O. Box 66  
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Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, DC 20554

RE: EB Docket No.06-36

Via: ECFS

Dear Secretary Dortch:

Pursuant to 47 CFR 64.2009(e); please find the accompanying annual CPNI certification and statement for calendar year 2007 for OpticTel Long Distance form 499 filer ID number 801758.

Should you have any questions regarding this filing, please direct them to the undersigned.

Best Regards

A handwritten signature in blue ink that reads "Keith Gile".

Keith Gile  
Consultant

Cc:

Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau via email  
[byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)

Best Copy Printing via email [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)

## **Certification of CPNI Filing**

**12/31//2007**

**EB Docket No. 06-36**

**EB-06-TC-060**

I, Cheryl Cottrell, hereby certify for calender year 2007 that I am CPNI Compliance officer of OpticTel Long Distance and that I have personal knowledge that OpticTel has established operating procedures that are to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2011

Cheryl Cottrell

Officer's Name

CPNI Compliance Officer

Title

Cheryl Cottrell

Signature

02-27-08

Date

**OpticTel Long Distance**  
**STATEMENT OF COMPLIANCE WITH CPNI**  
**47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011**  
**EB Docket No. 06-36**

OpticTel Long Distance (OpticTel) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- OpticTel has implemented internal procedures to educate and train employees about CPNI and the disclosure of CPNI. OpticTel has established disciplinary procedures for any employee that wrongfully discloses CPNI.
- OpticTel does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011. OpticTel provides either an opt-in notice or an opt-out notice when appropriate and maintains the customers choice. Therefore, the customers approval status can be determined prior to use of CPNI.
- OpticTel maintains records of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. Also, OpticTel does not currently allow access to third parties for marketing purposes but will obtain Op in approval from customers for which it may allow third party access. OpticTel will maintain records anytime third parties are allowed access to CPNI. Records of their own marketing, thier affiliate's marketing or any third party relase, include a description of each campaign, the specific CPNI that was used, and what products and services were offered. These records are retained for a period of at least one year.
- OpticTel requires sales personnel to obtain supervisory approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- OpticTel will provide written notice within five business days to the FCC any instance where the opt-out methods do not work properly, to such a degree that the customers inability to opt-out is more than an anomaly.

OpticTel did not experience any apparent attempts by data brokers to obtain CPNI and therefore did not take any action against data brokers during the calender year ended December 31, 2007.

OpticTel did not receive any apparent customer complaints concerning the unauthorized release of CPNI for the calender year ended December 31, 2007.